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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA,)	No. CR 11-00224 PSG
)	
12 Plaintiff,)	
)	
13 v.)	STIPULATION TO CONTINUE
)	STATUS HEARING FROM
14 JONATHON CHARLES DICKINSON,)	SEPTEMBER 15, 2011 TO OCTOBER 6,
)	2011; [PROPOSED] ORDER
15 Defendant.)	
16 _____)	<u>HONORABLE PAUL S. GREWAL</u>

17
18 **STIPULATION**

19 Defendant and the government, through their respective counsel, subject to the Court's
20 approval, hereby stipulate that the Court continue the status hearing in the above-captioned
21 matter, presently scheduled for, September 15, 2011 at 10:00 a.m., to October 6, 2011, at 1:30
22 p.m. The reason for the stipulation is as follows. Counsel for Mr. Dickinson needs additional
23 time to review the discovery, complete his investigation, and continue plea negotiations with the
24 government.

25 The parties further agree and stipulate that time should be excluded from and including
26 September 15, 2011, through and including October 6, 2011, to provide counsel reasonable time

1 to prepare, pursuant to Speedy Trial Act, 18 U.S.C. §3161(h)(7)(A) and (B)(iv). Accordingly,
2 the United States and the defendant agree that granting the requested exclusion of time will serve
3 the interest of justice and outweigh the interest of the public and defendant in a speedy trial.
4

5 Dated: September 13, 2011

6 /s/
MANUEL ARAUJO
Assistant Federal Public Defender
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8 Dated: September 13, 2011

9 /s/
DANIEL KALEBA
Assistant United States Attorney
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11 **[PROPOSED] ORDER**
12

13 Good cause appearing and by stipulation of the parties, it is hereby ordered that the status
14 conference hearing in the above-captioned matter shall be continued from September 15, 2011,
15 at 10:00 a.m., to October 6, 2011, at 1:30 p.m. It is further ordered that the period of delay from
16 September 15, 2011, through and including October 6, 2011, be excluded for purposes of Speedy
17 Trial Act computations pursuant to Title 18, United States Code, Sections 3161(h)(7)(A) and
18 3161(h)(7)(B)(iv).
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20 Dated: September 14, 2011

21 Paul S. Grewal
HONORABLE PAUL S. GREWAL
United States Magistrate Judge
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